

Margaret M. Fox
pfox@burr.com
Direct Dial: 803.799.9800
Direct Fax: 803.753.3278

Burr & Forman LLP
1221 Main Street
Suite 1800
Columbia, SC 29201

Mailing Address:
Post Office Box 11390
Columbia, SC 29211

Office 803.799.9800
Fax 803.753.3278

BURR.COM

December 2, 2019

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia SC 29210

**Re: Application of NextGen Communications, Incorporated for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities-Based Local Exchange and Intrastate Interexchange Telecommunications Services in the State of South Carolina, and for Alternative and Flexible Regulation
Docket No. 2019-353-C**

Dear Ms. Boyd:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition (the "Coalition"), a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service all parties of record will receive a copy of this Petition to Intervene via the U. S. Postal Service.

Thank you for your assistance.

Sincerely,

Burr & Forman LLP



Margaret M. Fox

MMF:kh

Enclosure: as stated

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2019-353-C

Re: Application of NextGen
Communications, Inc. for a Certificate of
Public Convenience and Necessity to
Provide Resold and Facilities-Based
Local Exchange and Intrastate
Interexchange Telecommunications
Services in the State of South Carolina,
and for Alternative and Flexible
Regulation

PETITION TO INTERVENE

In response to the Commission's Notice of Filing of the Application of NextGen Communications, Inc. ("NextGen") for a Certificate of Public Convenience and Necessity to provide local exchange and intrastate interexchange telecommunications services in South Carolina and for alternative and flexible regulation, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. A list of companies on whose behalf the SCTC is intervening in this matter is attached hereto as "Exhibit A."

2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.

3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not

appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,



M. John Bowen, Jr.
Margaret M. Fox
Burr & Forman LLP
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800
jbowen@burr.com
pfox@burr.com

Attorneys for Intervenor South Carolina
Telephone Coalition

December 2, 2019

Columbia, South Carolina

EXHIBIT A

South Carolina Telephone Coalition Member Companies for Purposes of Local Service Stipulation

Chesnee Telephone Company
Chester Telephone Company, d/b/a TruVista
Comporium, Inc. (f/k/a Rock Hill Telephone Company)
Farmers Telephone Cooperative, Inc.
Ft. Mill Telephone Company, d/b/a Comporium
Home Telephone ILEC, LLC d/b/a Home Telecom
Lancaster Telephone Company, d/b/a Comporium
Lockhart Telephone Company, d/b/a TruVista
McClellanville Telephone Company (TDS)
Norway Telephone Company (TDS)
Palmetto Rural Telephone Cooperative, Inc.
Piedmont Rural Telephone Cooperative, Inc.
PBT Telecom, d/b/a Comporium
Ridgeway Telephone Company, d/b/a TruVista
St. Stephen Telephone Company (TDS)
West Carolina Rural Telephone Cooperative, Inc.
Williston Telephone Company (TDS)

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2019-353-C

Re: Application of NextGen Communications,)
Inc. for a Certificate of Public Convenience)
and Necessity to Provide Resold and)
Facilities-Based Local Exchange and)
Intrastate Interexchange)
Telecommunications Services in the State)
of South Carolina, and for Alternative and)
Flexible Regulation)

CERTIFICATE OF SERVICE

I, Kathy Handrock, Paralegal for Burr & Forman LLP, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following parties of record by causing said copies to be deposited in the United States Mail, First Class, postage prepaid to:

Frank R. Ellerbe, III, Esquire
Samuel J. Wellborn, Esquire
Robinson Gray Stepp & Laffitte, LLC
1310 Gadsden St.
Columbia, SC 29201

C. Lessie Hammonds, Esquire
Christopher Huber, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Susan Ornstein, Senior Director
Legal & Regulatory Affairs
Comtech Safety & Security Technology
275 West Street, Ste. 200
Annapolis MD 21401

/s/ Kathy Handrock

Kathy Handrock, Paralegal
Burr & Forman LLP
Post Office Box 11390
Columbia, SC 29211

December 2, 2019

Columbia, South Carolina